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DOC#:

DATE FILED: 11/26/2024

## Green & Willstatter

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November 21, 2024

Hon. Nelson S. Roman United States District Court 300 Quarropas Street White Plains, New York 10601

re: United States v. Anthonio Randall, 24-cr-67 (NSR)

Dear Judge Roman:

This letter is an application to modify the bail conditions for Anthonio Randall to permit him to travel to Connecticut for the purpose of spending time with one of his children there during his curfew hours. This would not involve his staying overnight in Connecticut . The child is in the mother's custody and the Court had previously granted him permission to travel to Connecticut for the limited purpose of picking up and dropping of the child to facilitate his spending time with the child in New York. The modification would allow Mr. Randall to spend time with the child without the need to have both of them travel back and forth, such as attending the child's sports activities in Connecticut. The pretrial services office, by Officer Francesca Piperato, and the government, by A.U.S.A. Margaret Vasu, both consent to this modification.

Mr. Randall has been in compliance with pre-trial services, previously had his home detention replaced by a less restrictive curfew, and remains employed.

Very truly yours, /s/ *Theodore S. Green* Theodore S. Green

cc: All counsel (by ECF)
Francesca\_Piperato@nyspt.uscourts.gov

The assented to request to modify the bail conditions is GRANTED. Defendant will be permitted to travel to Connecticut for the limited purpose of picking up and dropping off his child. The Clerk of Court is directed to terminate the motion at ECF No. 37.

Dated: November 26, 2024 White Plains, NY SO ORDERED

NELSON S. ROMÁN United States District Judge